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NAUTILUS INSURANCE COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBERT "SONNY" WOOD, an individual;
ACCESS MEDICAL, LLC, a Delaware limited
liability company,

Plaintiffs,

v.

NAUTILUS INSURANCE GROUP, a
Delaware limited liability company, et al.,

Defendant.

NAUTILUS INSURANCE COMPANY,

Cross-Claimant,

v.

ROBERT "SONNY" WOOD; ACCESS
MEDICAL, LLC; FLOURNOY
MANAGEMENT, LLC AND ROES 1-10,
inclusive,

Counter-Defendants.

Case No. 2:17-CV-02393-MMD-DJA

**STIPULATION AND ORDER
FOR EXTENSION (THIRD REQUEST) OF
DEADLINES TO MOVE FOR FEES AND
COSTS FROM NAUTILUS'S DISCOVERY
MOTIONS HEARD ON FEBRUARY 20,
2020**

The parties hereto, by and through their undersigned counsel, stipulate for an extension of the deadline associated with Defendant Nautilus Insurance Company's ("Nautilus's") Request for Sanctions arising out of its Motion to Quash the Subpoena to the Cutler Law Firm, ECF No. 168 and its Motion for a Protective Order, ECF No. 184 (collectively "the Motions").

In the hearing on the Motions on February 20, the Court permitted Nautilus to file a motion to recover fees and costs related to the Motions within 14 days. The Court also required that the parties meet and confer on the fees and costs issue and amounts prior to Nautilus filing the motion.

The parties are making progress in the meet and confer process, but have not yet reached an agreement or an impasse. In light of that, and due to the current ongoing meet and confer communications, the parties request that the Court order:

1. Nautilus's motion for fees and costs, if necessary, is currently due on April 2, 2020 but that deadline is continued to April 16, 2020.
2. Access and Wood's opposition, if necessary, is currently due on April 16, 2020, but that deadline is continued to April 30, 2020.
3. Nautilus's reply, if any, is currently due April 23, 2020 but that deadline is continued to May 7, 2020.

IT IS SO STIPULATED.

DATED: April 2, 2020

SELMAN BREITMAN LLP

By: /s/ Linda Wendell Hsu
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1 DATED: April 2, 2020

KRAVITZ, SCHNITZER & JOHNSON, CHTD

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3 By: /s/ Jordan P. Schnitzer
4 JORDAN P. SCHNITZER
5 NEVADA BAR NO. 10744
6 THE SCHNITZER LAW FIRM
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11 Attorneys for Defendants ACCESS MEDICAL,
12 LLC and ROBERT CLARK WOOD, II

13 **IT IS SO ORDERED:**

14 Dated: April 3, 2020

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16 Daniel J. Albregts
17 United States Magistrate Judge
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of SELMAN BREITMAN LLP and, pursuant to Local Rule 5.1, service of the foregoing **STIPULATION AND [PROPOSED] ORDER FOR EXTENSION (THIRD REQUEST) OF DEADLINES TO MOVE FOR FEES AND COSTS FROM NAUTILUS'S DISCOVERY MOTIONS HEARD ON FEBRUARY 20, 2020** on this 2nd day of April, 2020, via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list, as follows:

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/s/ Pamela Smith

PAMELA SMITH

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